



2nd September 2014

Stansted SID Airspace Consultation
Box 25A
4000 Parkway
PO15 7FL

Dear Sirs,

I'm writing to you on behalf of the Parish council of Hatfield Broad Oak.

NATS Departure Route Proposal at London Stansted Airport - Consultation

Hatfield Broad Oak Parish Council welcomes the opportunity to respond to the above proposal to change the use of two existing departure routes to the south and east of Stansted Airport for daytime flights (6am – 11pm).

The NATS proposal identifies three key benefits from the re-routing of flights, being reduced CO₂, reduced air traffic delay and a reduction in the number of people regularly overflown during the day.

However it is clear from the information you have provided in the consultation documents that these assumptions are either exaggerated or incorrect.

From the consultation papers, appendices and other information we have been provided with, we are opposed to the diversion of flights from using the Dover route to using the Clacton route for the following reasons:-

Reduced CO₂ emissions.

In Table 3: Fuel Savings, NATS assesses the potential fuel savings and CO₂ emissions benefits resulting from this proposed change of departure routes. However, the reduction in CO₂ emissions actually obtained, compared with the total CO₂ emissions for all traffic operating at Stansted, would mean a saving of less than 1%. The Government's strategy for the environment is to prioritise the reduction of noise disturbance near to an airport at up to 4,000 feet, with a balance between noise and emissions up to 7,000 feet and emissions above 7,000 feet. The suggested reduction in emissions has been calculated over the wider height range and as such is certainly not sufficient to justify the change itself.

Reduced delay for Stansted Airport and neighbouring airports

Our airport community representatives advise us that whilst it is true that reduced delay can be achieved by increased use of continuous climb, the consultation does not say what reduction in delay would be achieved with the planned changes. In any event, delays at Stansted are very low and ATC delays in the UK attributable to NATS averaged only 1.6 seconds per flight. Again, suggesting reducing delay as a benefit of the change is exaggerated and would not justify the change itself.

Reduction in the number of people regularly overflown during the day

Below 4,000ft, while 1,470 fewer people would be overflown, 2,400 people would be overflown more intensively – a 63% increase. 4,000ft is the height where noise is at its most disruptive and defined by NATS own guidelines as the height where noise disruption should be of prime consideration to routing. This proposal would be double the number of flights on the Clacton route overflying nearly twice as many people. Should Stansted reach its permitted capacity this would increase to four times the traffic overflying twice as many people under this critical height. The proposal therefore does not provide the benefit of reducing the people overflown in either quantum or event terms.

Additional Concerns

- Hatfield Broad Oak has an Area of Outstanding Natural Beauty within its Parish - Hatfield Forest, a National Trust property. This proposal would bring more air traffic closer to the southern boundary of this Site of Special Scientific Interest and the UK's best remaining Medieval Royal Hunting Forest.
- People living under the Dover route would still be overflown at night. We understand that some 20% of all complaints at Stansted Airport in 2012 were due to noise from night flights (11pm to 6am), a high figure when night flights comprised 6% of the total number of flights. It does not appear that those under the Dover route will experience the relief they might expect from the proposal.
- We understand this proposal (LAMP Phase 1) is part of a larger plan. However these details have not been forthcoming. Surely we should be made aware of the full plan before we can fully evaluate this proposal?
- We await the Airports Commission's final report and recommendations, following the General Election in 2015, regarding the proposed new runway in the south east of England. Wouldn't it be beneficial to wait until the new runway location is decided before making what could be, unnecessary changes to current departure routes from Stansted Airport?

In Conclusion

Whilst we understand there will inevitably be winners and losers in any change, if the proposals are implemented there will be little or no benefit to villages nearest to the airport, indeed, there will be more people affected by increased noise and disturbance. In particular, our parish of Hatfield Broad Oak, along with surrounding communities, will be worse affected by the change, which goes against the established principle of route certainty.

We strongly object to the proposal as it offers no benefit for residents in the area and does not provide any information on further air space changes that might be suggested for Stansted Airport. The consultation is misleading and incomplete.
Please confirm safe receipt of this submission.

Sincerely yours,

Urška Sydee

Clerk to the Council
On behalf of Hatfield Broad Oak Parish Council